

**UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

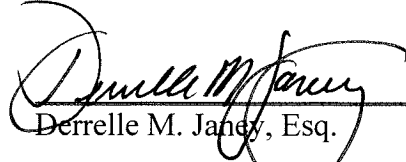
-----	X	
	:	
<b>JOHN COTTAM,</b>	:	
	:	
Plaintiff,	:	
	:	
-against-	:	
	:	Case No. 16-CV-04584 (RJS)
<b>GLOBAL EMERGING CAPITAL GROUP,</b>	:	
<b>LLC, ALEXANDER KIBRIK, WILLIAM</b>	:	
<b>UCHIMOTO, 6D GLOBAL</b>	:	<b>NOTICE OF MOTION</b>
<b>TECHNOLOGIES, INC., 6D</b>	:	
<b>ACQUISITIONS, INC., and TEJUNE</b>	:	
<b>KANG,</b>	:	
	:	
Defendants.	:	
-----	X	

**PLEASE TAKE NOTICE**, that upon the accompanying Declaration of Derrelle M. Janey, Esq. dated August 11, 2017 with attached exhibits, including Exhibit 1, the transcript of the September 14, 2016 court conference; Exhibit 2, the transcript of the July 31, 2017 court conference; and Exhibit 3, a copy of historic stock prices for 6D Global Technologies, Inc. (SIXD) according to NASDAQ records; the accompanying Affidavit of Plaintiff Dr. John Cottam (“Plaintiff”) dated August 10, 2017 with attached exhibits, including Exhibit A, the Subscription Documents; and the accompanying Memorandum Of Law, Plaintiff will move this Court, before the Honorable Judge Richard J. Sullivan, at the Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York 10007, Courtroom 905, on a date and at a time designated by the Court, for an Order pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting summary judgment in favor of Plaintiff in connection with his breach of contract claim, and against Defendants 6D Global Technologies, Inc., 6D Acquisitions, Inc., and Tejune Kang (collectively, “Defendants”) on the issue of Defendants’ liability for breach of contract, and for such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE** that, pursuant to the Court's Order on July 31, 2017, Defendants' opposition to the within motion, if any, must be filed by September 8, 2017. Plaintiff's reply, if any, shall be filed by September 22, 2017.

Dated: New York, New York  
August 11, 2017

Respectfully Submitted,



Derrelle M. Janey, Esq.

GOTTLIEB & JANEY LLP  
Trinity Building  
111 Broadway, Suite 701  
New York, NY 10006  
Tel.: (212) 566-7766  
Fax: (212) 374-1506  
Email: djaney@gottliebjaney.com

*Counsel for Plaintiff  
John Cottam*

To: Jacques Catafago, Esq.  
Tom M. Fini, Esq.  
CATAFAGO FINI LLP  
The Empire State Building  
350 Fifth Avenue, Suite 7412  
New York, NY 10118  
Tel.: 212-239-9669  
Email: tom@catafagofini.com

*Counsel for Defendants 6D Global Technologies,  
Inc., 6D Acquisitions, Inc., and Tejune Kang*